

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

JOHN DOE, individually and on behalf of all
others similarly situated,
Plaintiff,

v.

BROWN UNIVERSITY,
Defendant.

C.A. No. 20-cv-00191-WES-LDA

MOTION FOR AN EXTENSION OF TIME

Defendant Brown University requests an extension of time within which it must file its response to Plaintiff John Doe's ("Plaintiff") Class Action Complaint. Brown's response is currently due on June 12. Dkt. 12. As explained in the accompanying Motion for an Order to Show Cause, Plaintiff has not attempted to meet his burden to justify proceeding under a pseudonym. What Brown believes is a baseless effort to proceed anonymously prejudices it in evaluating the legal bases upon which the Complaint should be dismissed and the class action allegations rejected. As Brown is limited in its response to Plaintiff's complaint prior to the outcome of its outstanding motion, Brown respectfully requests the Court extend its deadline to respond to 30 days after its Motion for an Order to Show Cause is resolved by the Court.

Dated: May 28, 2020

/s/ Robert Clark Corrente
Robert Clark Corrente (No. 2632)
WHELAN CORRENTE & FLANDERS LLP
100 Westminster Street, Suite 710
Providence, RI 02903
Telephone: (401) 270-1333
Facsimile: (401) 270-3760
rcorrente@whelancorrente.com

Mark S. Levinstein (*pro hac vice forthcoming*)
Amanda M. MacDonald (*pro hac vice forthcoming*)
WILLIAMS & CONNOLLY LLP
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
mlevinstein@wc.com
amacdonald@wc.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on May 28, 2020, I filed and served this document through the electronic filing system on all counsel of record. The document electronically filed and served is available for viewing and/or downloading from the Rhode Island Judiciary's Electronic Filing System.

/s/ Robert Clark Corrente
Robert Clark Corrente